

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>FIELDWOOD ENERGY III LLC, et. al,</b>  <b>Post-Effective Date Debtors.<sup>1</sup></b>  -----	§ § § § § § §	<b>Chapter 11</b>  <b>Case No. 20-33948(MI)</b>  <b>(Jointly Administered)</b>  <b>Re. ECF No. 2487, 2498</b>
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**QUARTERNORTH ENERGY LLC’S WITNESS AND EXHIBIT LIST  
FOR HEARING ON JUNE 7, 2022**

QuarterNorth Energy LLC (“**QuarterNorth**”) files this witness and exhibit list (the “**Witness and Exhibit List**”) for the hearing on the *Emergency Motion of BP Exploration & Production, Inc. to Alter or Amend May 24 Order Pursuant to Bankruptcy Rule 9023* (ECF No. 2487) and to *Shell Offshore, Inc.’s Joinder to the Emergency Motion of BP Exploration & Production, Inc. to Alter or Amend May 24 Order Pursuant to Bankruptcy Rule 9023* (ECF No. 2498), scheduled for **June 7, 2022 at 1:30 p.m. (Prevailing Central Time)** (the “**Hearing**”):

**WITNESSES**

QuarterNorth may call any of the following witnesses at the Hearing:

1. Any witness called or listed by any other party; and

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<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494); Fieldwood Energy Inc. (4991); GOM Shelf LLC (8107); and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “**Post-Effective Date FWE I Subsidiaries**”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

2. Any rebuttal witnesses.

### **EXHIBITS**

QuarterNorth may offer into evidence any one or more of the following exhibits:

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>
1.	<i>Purchase and Sale Agreement Among Fieldwood Energy LLC and its Affiliates Signatory Hereto as Sellers QuarterNorth Energy LLC as Buyer and Mako Buyer 2 LLC as Buyer 2</i> [sealed by previous Court order at ECF No. 1829]				
2.	<i>Debtors' Notice of Bankruptcy Rule 2004 Request for Production of Documents from BP Exploration &amp; Production Inc.</i> (ECF No. 1387)				
3.	<i>Debtors' Notice of Bankruptcy Rule 2004 Request for Production of Documents from Shell Offshore Inc.</i> (ECF No. 1388)				
4.	February 2, 2021 Hearing Transcript (ECF No. 854)				
5.	July 9, 2021 Amended Hearing Transcript (ECF No. 2411)				
6.	August 24, 2021 Hearing Transcript (ECF No. 2006)				
7.	Any exhibit designated by any other party				
8.	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases				
9.	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party				

QuarterNorth reserves the right to amend or supplement the Witness and Exhibit

List at any time prior to the Hearing.

Dated: June 6, 2022  
Houston, Texas

Respectfully submitted,

/s/ Paul R. Genender

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*Attorneys for QuarterNorth Energy LLC*

**Certificate of Service**

I hereby certify that on June 6, 2022, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Paul R. Genender  
Paul R. Genender